

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

**METROPOLITAN ST. LOUIS EQUAL  
HOUSING & OPPORTUNITY COUNCIL,**

Plaintiff,

vs.

**NORMAN L. JEZEWAK and SIGNATURE  
PROPERTY, LLC,**

Defendants.

Case No.: 4:13-CV-00481-HEA

**DEFENDANTS' MOTION TO BIFURCATE TRIAL**

COME NOW Defendants, Norman L. Jezewak ("Jezewak") and Signature Property, LLC, ("Signature") (collectively, "Defendants") by and through their undersigned counsel, and for their Motion to Bifurcate pursuant to Fed. R. Civ. P. 42(b), states as follows:

Under Fed. R. Civ. P. 42(b), "[f]or convenience, to avoid prejudice, or to expedite and economize, the court may order a separate trial of one or more separate issues, claims, crossclaims, counterclaims, or third-party claims." In the Eight Circuit, "[t]he decision of whether to isolate the punitive damages phase of the trial is within the sound discretion of the trial court." *Thorne v. Welk Inv., Inc.*, 197 F.3d 1205, 1213-14 (8th Cir. 1999).

WHEREFORE, Defendants respectfully request that the Court bifurcate Plaintiff's punitive damages claim from the rest of the trial.

Respectfully submitted,

THE GOGEL LAW FIRM

/s/ Jeremy A. Gogel

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**Counsel for Defendants Norman L.  
Jezewak and Signature Property, LLC.**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document was sent via e-mail on May 9, 2016, to the following counsel of record:

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**Attorney for Metropolitan St. Louis Equal  
Housing & Opportunity Council**

/s/ Jeremy A. Gogel

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